

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

VARILEASE FINANCE, INC., and)
VFI KR SPE I LLC,) Case No. _____
)
)
Plaintiffs,)
)
v.)
)
)
)
EARTHCOLOR, INC., MEDIA)
PRINTING CORPORATION, EC)
HOLDO, INC. EC SUBCO, INC.,)
BARTON PRESS, INC., CEDAR)
GRAPHICS, INC., EARTH COLOR)
HOUSTON, INC., EARTH COLOR NEW)
YROK, INC., EARTH THEBAULT INC.,)
INTERNATIONAL COLOR SERVICES,)
INC., EARTHCOLOR GROUP, LLC,)
MITTERA EAST, LLC, MITTERA)
FLORIDA, LLC, MITTERA GROUP,)
INC., MITTERA NEW JERSEY, LLC,)
MITTERA NEW YORK, LLC, and)
MITTERA HOUSTON, LLC.)
)
Defendant.)
)
)

**AFFIDAVIT OF TOM SLAUGHTER IN SUPPORT OF MITTERA EAST, LLC'S
NOTICE OF REMOVAL**

STATE OF NEW JERSEY)

) ss.

COUNTY OF MORRIS

TOM SLAUGHTER, being duly sworn, deposes and says:

1. I am over the age of 21, under no disability, and a resident of Sussex County, New Jersey. Since 2013, I have served as Chief Strategy Officer and General Counsel for Defendant Mittera Group, Inc., and since 2017, I have served as General Counsel for Defendants Mittera East, LLC, Mittera Florida, LLC, Mittera Houston, LLC, Mittera New Jersey, LLC, and Mittera New York, LLC (together with Mittera Group, Inc., "Mittera"). I also serve as President and General Manager of Mittera New Jersey, LLC. I worked as outside counsel to Mittera from 2005 to 2013.

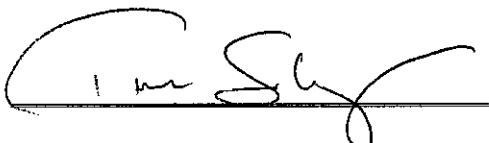
2. The facts set forth herein are based upon my personal knowledge, information, and belief, and are true to the best of my knowledge and recollection. I have not been promised any benefit or threatened with any penalty to influence what I say.

3. Mittera Group, Inc. is a registered corporation in the State of Iowa, with its principal place of business in Iowa. It is the sole member of Mittera East, LLC, and Mittera East, LLC is the sole member of Mittera Florida, LLC, Mittera Houston, LLC, Mittera New Jersey, LLC, and Mittera New York, LLC (together, the "Mittera LLCs"). The Mittera LLCs are all Iowa limited liability companies. Mittera East, LLC has its principal places of business in Iowa; Mittera Houston, LLC has its principal place of business in Texas, and the remaining Mittera LLCs have their principal places of business in the state for which they are named.

4. I am acquainted with EarthColor Group, LLC, a limited liability company organized under the laws of the State of Delaware. I do not know with specificity the number and citizenship of EarthColor Group, LLC's members, but to the best of my knowledge, its members are domiciled in states located throughout the northeast United States (namely, Connecticut, Massachusetts, New Jersey, New York, and Pennsylvania) and in the Cayman Islands, and none of its members are domiciled in the States of Michigan or Utah.

5. I am acquainted with Plaintiff VFI KR SPE I, LLC ("Plaintiff"). To the best of my knowledge, Plaintiff is a limited liability company organized under the laws of the State of Delaware. I do not know with specificity the number and citizenship of Plaintiff's members, but Varilease Finance, Inc., a Michigan corporation with its principal place of business in Utah, is its sole managing member.

6. This concludes my affidavit.



Tom Slaughter

Subscribed and sworn to before me

this 20th day of MAY, 2018.



Notary Public

